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December 29, 2014

VIA ECF

Hon. Paul A. Crotty
United States District Court
Southern District of New York
500 Pearl Street, Chambers 1350
New York, New York 10007

Re: Martinez v. The Mount Sinai Hospital
Docket No.: 14-civ-2548

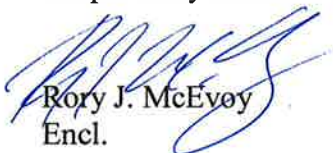
Dear Judge Crotty:

On behalf of our client, The Mount Sinai Hospital ("Mount Sinai"), and after consultation with Plaintiff's counsel, I write pursuant to the Court's Individual Practices Rule 1(E) to make a joint request for a thirty day extension of time to complete fact discovery from January 7, 2015 until February 6, 2015.

The parties have completed all written discovery. We were originally scheduled to take Plaintiff's deposition on December 16, and the deposition of a non-party witness from Mount Sinai on December 18. However, on the Friday before her deposition, Plaintiff informed Mount Sinai that she was unable to take time off of work the following week. Given the upcoming holidays and the fact that Mount Sinai preferred to take Plaintiff's deposition before proceeding with a non-party witness, we were unable to find alternative dates in December for the depositions. We have selected dates for the depositions in January. Plaintiff is available on January 9, 2015, and the non-party witness from Mount Sinai is available on January 13, 2015. Accordingly, the parties request a thirty day extension to allow time to complete these depositions and to engage in any post-deposition discovery that may be necessary.

We have enclosed a proposed revised scheduling order for the Court's consideration, which adjusts all future deadlines by seventy-five days. This is the second request to extend the discovery deadline. The Court previously granted a joint request for a seventy-five day extension of the discovery deadline on October 22, 2014.

Respectfully submitted,


Rory J. McEvoy
Encl.



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cc: David Abrams, Esq. (via ECF)